

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

FILED

JUN 25 2018

Clerk, U.S. District Court
Texas Eastern

UNITED STATES OF AMERICA

§
§
§
§
§

v.

No. 4:18CR **106**

Judge **CRONE**

SYED RAZVI

ELEMENTS OF THE OFFENSE

You are charged in Count One of the Information with a violation of 18 U.S.C. § 371, Conspiracy to Commit an Offense Against the United States by Smuggling Goods out of the United States and Violating the International Emergency Economic Powers Act. The essential elements that must be proved beyond a reasonable doubt in order to establish a violation of that section are:

A. 18 U.S.C. § 371

1. You and at least one other person made an agreement to commit an offense against the United States by smuggling goods out of the United States and violating the International Emergency Economic Powers Act as described in the Information;
2. You knew the unlawful purpose of the agreement and joined in it willfully, that is with the intent to further the unlawful purpose; and
3. One of the conspirators during the existence of the conspiracy knowingly committed at least one of the overt acts described in the Information in order to accomplish some object or purpose of the conspiracy.

The essential elements of a violation of 18 U.S.C. § 554, Smuggling Goods out of the United States are:

B. 18 U.S.C. § 554

1. The defendant fraudulently and knowingly exported merchandise, as described in the Information;
2. The defendant's export was contrary to the laws and regulations described in the Information; and
3. The defendant knew the export was contrary to the laws and regulations described in the Information.

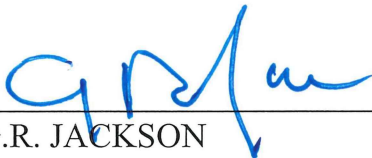
The essential elements of a violation of 50 U.S.C. § 1705, Violating the International Emergency Economic Powers Act:

C. 50 U.S.C. § 1705(a)

1. The defendant exported items, as described in the Information, from the United States;
2. The items the defendant exported or caused to be exported were controlled for export and required an export license for the destination country;
3. The defendant failed to obtain a license or other authorization from the Department of Commerce prior to exporting the items or attempting to export the items; and
4. The defendant acted knowingly and willfully.

Respectfully submitted,

JOSEPH D. BROWN
UNITED STATES ATTORNEY



G.R. JACKSON
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was emailed to defense counsel on
this the 22nd day of June, 2018.



G.R. JACKSON
Assistant United States Attorney